

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

Michael Jordon,
ET AL

Plaintiff/Petitioner(s).

-vs-

Patricia Kelley,
ET AL

Defendant/Respondent(s).

Docket No. 08-638-DRH
(To be supplied by the Clerk)

☒ **CIVIL RIGHTS COMPLAINT**
pursuant to 42 U.S.C. §1983
(State Prisoner)

☐ **CIVIL RIGHTS COMPLAINT**
pursuant to 28 U.S.C. §1331
(Federal Prisoner)

☐ **CIVIL COMPLAINT**
pursuant to the Federal Tort Claims
Act, 28 U.S.C. §1346, 2071-2680

SEP -9 2008

CLERK OF DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS, MO

I. JURISDICTION

A. Plaintiff's mailing address and/or register number and present place of confinement.

WHEMEN Drive P.O. Box 31
CHESTER IL 62233

B. Defendant Patricia Kelley is employed as
(Name of First Defendant)

Director
(Position/Title)

with CHESTER Mental Health Center
(Employer's Name and Address)

Patricia Kelly, WHEMEN Drive P.O. Box 31
CHESTER IL 62233

At the time the claim(s) alleged in this complaint arose, was the defendant employed by the state, local or federal government?

Yes (X) No ()

If your answer is "yes", briefly explain:

Patricia Kelley is the
Director of CHESTER Mental Health
Center.

C. Defendant Scott Walter is employed as

(Name of Second Defendant)

S.T.A. STAFF

(Position/Title)

with CHESTER Mental Health Center

(Employer's Name and Address)

Scott Walter, 6410 W. Lake St.

Box 31 Chester, IL 62237

At the time the claim(s) alleged in this complaint arose, was the defendant employed by the state, local or federal government?

Yes (☒) No (☐)

If your answer is "yes", briefly explain:

Scott Walter is a Staff Member
employed by the State of Illinois.

D. Using the outline of the form provided, include the above information for any additional defendant(s).

Other Defendants will be added
when a lawyer is appointed by
the court. The plaintiff do not
know all the individuals names that
were added to the process of the
case the class of individuals.

II. PREVIOUS LAWSUITS

A. Have you begun any other lawsuits in state or federal court relating to your imprisonment?

Yes (☐) No (☒)

B. If your answer to "A" is "yes", describe the lawsuit(s) in the space below. (If there is more than one (1) lawsuit, you must describe the additional lawsuits on another sheet of paper, using the same outline.) Failure to comply with this provision may result in summary denial of your complaint.

There is no class lawsuit
and the court had unusual jurisdiction
The plaintiff have suffered from
There is no class lawsuit acceptable
lawyer. NO A Constitutional
Alternative means for a pretrial
Detour to redress themselves to
The Courts.

1. Parties to previous lawsuits:
Plaintiff(s) NA

Defendant(s) NA

2. Court (if Federal Court, name the District; if State Court, name the County)
NA

3. Docket number NA

4. Name of Judge to whom case was assigned NA

5. Type of case (for example: Was it a Habeas Corpus or Civil Rights action?)
NA

6. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?)
NA

7. Approximate date of filing lawsuit NA

8. Approximate date of disposition NA

III. GRIEVANCE PROCEDURE

- A. Is there a prisoner grievance procedure in the institution? no there not
- B. Did you present the facts relating to your complaint in the prisoner grievance procedure?
Yes () No (x)
- C. If your answer is "yes",
 1. What steps did you take? But it was given to OJIC
Office of Inspector General who
continues to do nothing.
 2. What was the result? The Result is the investigation
is unfounded by the Office of
Inspector General every time.
- D. If your answer is "no", explain why not. The Office of Inspector
General, and Human Rights
Handles Reports of Abuse, But
Happens to the Accuser
They walk, and the patient, but
don't just a further beating.

E. If there is no prisoner grievance procedure in the institution, did you complaint to prison authorities? Yes (✓) No ()

F. If your answer is "yes",

1. What steps did you take? THE continue to cover up
THE PHYSICAL ABUSE, and state
nothing has happen.
2. What was the result? PATRICIA KELLEY turns Here
Head and neglects to stop the
CON SPIRACY.

G. If your answer is "no", explain why not. THE Patients has NO
Other Remedy, but to file a Federal
complaint, and seek injunctive
Relief.

H. Attach copies of your request for an administrative remedy and the response(s) you received. If you cannot do so, explain why not:

THE will be Report Annexed to the
complaint at a latter time, because
your of a lawyer has them.

IV. STATEMENT OF CLAIM

State here, as briefly as possible, the FACTS of your case. State who, what, when, where and how you feel your constitutional rights were violated. Do not cite cases or statutes. If you choose to submit legal arguments or citations, you must do so in a separate memorandum of law. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. If your claims relate to prison disciplinary proceedings, attach copies of the disciplinary charges and any disciplinary hearing summary as exhibits.

Only two (2) extra pages (8 1/2 x 11") are permitted, if necessary, to complete your statement of claim. Additionally, attach any relevant, supporting documentation.

THE Plaintiff MICHAEL JAYDAN, and other
Prisoner in the Department of Prison
services have suffered physical abuse
due to STAFF MEMBERS PHYSICALLY
ASSAULTING him, and other, at Sector of
the 2, 2008 I was in the TV Room
Watching tv with other Pre-Trial
Detainees, MR. LAMAR, MR. BARKER, and
other, and Staff Members who
started making threats telling
me the would KICK MY ASS, At this
Time I went to my Room, and they
came Behind me, and ASKED DID I

NEED A P.R.N. FROM THE NURSE, AND I
 INFORM THEM MR. SHANE, AND SCOTT
 WALKER WENT AND GOT THREE OTHER
 STAFF CAME INTO MY ROOM AND ASSAULTED
 ME WITHOUT ANY REASON AT ALL.
 THE SAME TIME I WAS PLACED IN RESTRAINTS
 UNTIL "MR. LARRY M. BANKS" HAD HIS
 POWER OF ATTORNEY TO SUBMIT WRITTEN
 INQUIRY INFORMING THE ADMINISTRATOR
 "PATRICIA KEALEY" AND "DAVID DUNKER" OF
 THE CRUEL AND UNUSUAL PUNISHMENT
 I "MICHAEL JANDON" HAD SUFFERED. MR.
 BANKS SEEN EVERYTHING BECAUSE HE
 WAS LOOKING OUT HIS DOOR AT THE TIME
 OF THE INCIDENT. "MR. LARRY M. BANKS"
 INFORMED A.I.G. "OFFICE OF INSPECTOR
 GENERAL" THAT ON SEPTEMBER 2, 2008
 THE OFFICERS HAD COME INTO MY CELL
 AND BEAT AND KICKED AND PLACED ME IN
 RESTRAINTS. I WAS PLACED IN RESTRAINTS
 FOR NO REASON AT ALL, THE NURSE
 CAME WITH NOSS, I WAS THROWN, AND
 PLACED IN ORDER TO BE ABLE TO ME WITHOUT
 JUST CAUSE. ON SEPTEMBER 4, 2008
 ANOTHER PATIENT MR. HUNT WAS ASSAULTED
 BY THE SAME INDIVIDUALS THE SAME
 WAY AND WAS PLACED IN RESTRAINTS
 AND "MR. LARRY M. BANKS" SENT A
 FAX TO A.I.G. "OFFICE OF INSPECTOR
 GENERAL" THE CURMS, AND INTERVIEW THE
 VICTIM MR. HUNT ALSO NR. BANKS
 THE STAFF WRITING STATEMENTS FROM
 MR. BANKS, AND MR. HUNT. SCOTT
 WALKER WAS A PART OF THE
 PHYSICAL ATTACK. AT THE INCIDENTS
 THE NURSE DELIBERATELY INDIFFERENT TO
 CHECK THE PATIENT TO SEE WAS HE
 HURT, IT WASN'T UNTIL THE FAX
 WENT TO "DAVID DUNKER" THAT SOMETHING
 HAPPENED. THE DOCTOR POLICE ARE TO
 CALL THE PATIENT FOR NOTHING WHEN
 WITHIN THE PATIENT TO SAVE THE
 BUT DUE ONLY TO MR. BANKS FAVOR
 PART OF THE STAFF ARE NOT
 FOR PROOF, BECAUSE MR. BANKS
 OTHER WITNESSES THESE ATTACKS.
 THEIR MORE, BUT DUE TO ME HAVING
 NO LEGAL EDUCATION, AND THEIR NOT HAVING
 A LAW LIBRARY OR A CONSTITUTIONAL ACCEPTABLE
 ALTERNATIVE MEANS - THE PATIENTS COMMIT
 VIOLATIONS. THE COURT PROPERLY.

V. REQUEST FOR RELIEF

State exactly what you want the Court to do for you. If you are a state or federal prisoner, and seek relief which affects the fact or duration of your imprisonment (for example: illegal detention, restoration of good time, expungement of records or parole release), you must file your claim on a Habeas Corpus form, pursuant to 28 U.S.C. §2254, 28 U.S.C. §2255, or 28 U.S.C. §2241.

The plaintiff is ASKING for Injunction Relief pursuant to 28 U.S.C. §2283 Anti Injunction Act, and want the Federal Forcible Entry Relief, And have "Chester Mental Health Center" to get Auto Video Records for the safety of the patients, because there's numerous complaints from staff with guns and nothing is happen to employees, and so one is going to get killed.

VI. JURY DEMAND (check one box below)

The plaintiff does ☒ does not ☐ request a trial by jury. (See Fed.R.Civ.P. 38.)

7th Amendment
Jury Trial

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I, the undersigned, certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11(a) and (b) may result in sanctions, monetary or non-monetary, pursuant to Federal Rule of Civil Procedure 11(c).

The plaintiff hereby requests the Court issue all appropriate service and/or notices to the defendant(s).

Signed this 9 day of September, 2008

Michael Jaudon
Signature of Plaintiff

Michael Jaudon
Signature of attorney, if any